

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

vs.

PROPOSED JURY QUESTIONS

Case No. 18-CR-6094-FPG

XAVIER TORRES,

Defendant.

The defendant, Xavier Torres, respectfully requests that the following questions be asked of potential jurors:

1. Have you ever lived in the area of Burbank Street in the City of Rochester? If yes, during what time period?
2. Do you feel that individuals who reside in the city of Rochester would be more likely to participate in criminal activity rather than someone who lives in the suburbs? If yes, please explain your answer?
3. Have you read any publicity concerning this case in general? If so, what is the source of your information?
4. Have you ever been accused of doing something of a criminal nature that you were not responsible for? If so, please explain what happened.
5. Have you or someone you know been affected by drug use? Would that experience affect your ability to be fair and impartial in this case?
6. How do you feel about the presumption of innocence in a criminal case? Do you accept this concept of the law?
7. Do you accept the premise that the government must prove its case against the defendants by credible evidence beyond a reasonable doubt?

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8. What activities do you participate in for fun?
9. Do you have an opinion about the government relying upon cooperating witnesses who testify in exchange for reduced charges or sentences?
10. Is there any information that you think we should know about you prior to determining whether you should serve as jurors in this case?

Dated: Rochester, New York
October 27, 2020

Yours etc.,

/s/ Maurice Verrillo

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